Approved For Release 2007/11/06 : CIA-RDP87B01034R000700070016-5

NSA review completed

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COMPARISON OF PROPOSED NSDD WITH PD-24

NSDD	PD-24	CHANGE	CONSEQUENCES
General	General	Expands scope to include all automated systems including word processors.	Raises questions of feasibility of managing consolidated effort.
1	2	Expands security mission to include information affecting privacy of U.S. persons.	Raises questions of Executive Agent's and National Manager's suitability to represent entire Government's privacy interests.
2c, 6b	2c,d	Adds provision for the Government to formulate strategies and measures for providing protection for "systems which handle nongovernment information the loss of which could adversely affect the national interest or the rights of U.S. persons...." Explicit responsibilities and mechanisms to implement this policy are not provided but must devolve on the DIRNSA.	The propriety of this goal, and its pursuit by a military agency, are legal issues which should be explored by the Attorney General.
3	4	Replaces PD-24-based National Communications Security Committee with a Steering Group and National Telecommunications and Information Systems Security Committee (NTISSC).	The breadth of issues covered raises questions of who should be represented on these groups, and what other organizations are affected.

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COMPARISON OF PROPOSED NSDD WITH PD-24

NSDD	PD-24	CHANGE	CONSEQUENCES
3c	no ref.	Empowers Steering Group to approve "consolidated resources program and budget proposals" for national telecommunications and information systems security.	Restructures budget review process for these areas, with significant impact on DCI role for NFIP and on department and agency head authorities to set priorities.
3d	4g	Centralizes review of systems' security status by the Steering Group.	Implies migration of accreditation approval responsibilities from departments and agencies to the Steering Group, which would be separated from the environment to be accredited.
4b(3)	no ref.	NTISSC to "administer matters pertaining to the release of sensitive security information, techniques and materials to foreign governments or international organizations (except in intelligence operations managed by the Director, Central Intelligence Agency)."	Supersedes the DCI's E.O. 12333 authorities to prescribe policies for and coordinate foreign intelligence relationships (except for DDO operations).
5	4c	Makes SecDef Executive Agent for Automated Systems Security as well as for Telecommunications Security. Expands his executive agent role to cover all electronic information, not just "national security" information as before.	Considering the rapid expansion of word processing, makes SecDef Executive Agent for all Government information processing.

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NSDD	PD-24	CHANGE	CONSEQUENCES
5	4d	Secretary of Commerce out as Executive Agent for unclassified, non-national security information, and for commercial and private sector information.	Severely curtails Bureau of Standards role and functions. Raises question of legal propriety of military responsibility for this area.
5f	no ref.	Empowers SecDef to "procure for and provide to government agencies, and where appropriate, to private institutions (including Government contractors) and foreign governments, equipment and other materials."	GSA, and department and agency heads with delegated authority, would lose the right to procure computers and word processors. Centralized procurement would make it very difficult to meet schedule and individual agency requirements.
5g	no ref.	Empowers SecDef to develop and submit a National Telecommunications and Information Systems Security Program budget, "including funds for the procurement and provision of equipment and materials" Government (and contractor) wide.	Seriously affects the budget cycle, department and agency head administrative prerogatives, and DCI role in NFIP. Raises questions of feasibility of discharging this responsibility.
6	no ref.	The DIRNSA would be responsible for carrying out the foregoing responsibilities of the Secretary of Defense as Executive Agent.	All previously itemized SecDef responsibilities may be delegated to DIRNSA.
6a,e	no ref.	Empowers DIRNSA to "empirically examine Government telecommunications and automated information systems and evaluate their vulnerability to hostile interceptions and exploitation."	Shifts security accreditation responsibility for all Government and contractor telecommunications and information systems to DIRNSA.

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COMPARISON OF PROPOSED NSDD WITH PD-24
Page 4

NSDD	PD-24	CHANGE	CONSEQUENCES
6b	no ref.	Empowers DIRNSA to develop and approve "all standards, techniques, systems and equipment" "related to cryptography, communications security and trusted computer and automated information systems."	Entire Government must use DIRNSA specified standards, techniques, systems and equipment.
6b,e	no ref.	Empowers DIRNSA to perform all Government-sponsored R&D for telecommunications and information systems	Eliminates such roles for CIA (ISSG and ORD), DOE (LLL, etc.), Bureau of Standards, GSA and others.
6b,10a	4g	Removes PD-24 authority of heads of Federal departments and agencies to organize and conduct their communications security and emanations security activities as they see fit, and vests this responsibility with the DIRNSA.	In CIA, for example, removes OC COMSEC and OS ISSG missions.
6b	no ref.	Empowers DIRNSA to conduct liaison with foreign governments and international organizations.	Impacts formal and informal roles of DCI, State Department and Commerce Department in many relationships.
6b	no ref.	Empowers DIRNSA to conduct all security-related liaison with private institutions.	Removes Bureau of Standards role with American National Standards Institute, Question of legal propriety arises again.
6c	no ref.	Empowers DIRNSA to operate industrial facilities to provide "cryptographic and other sensitive security materials or services."	Precludes any other agencies from working or contracting in those areas. Could impact private sector research into security methods.

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COMPARISON OF PROPOSED NSDD WITH PD-24

NSDD	PD-24	CHANGE	CONSEQUENCES
6d	no ref.	Empowers DIRNSA to assess and disseminate information on hostile threats to telecommunications and automated information systems.	Removes analysis missions from CIA and DIA, such as technology transfer and Soviet technology.
6g,10b	no ref.	Requires department and agency heads to provide DIRNSA all information "he may need to discharge the responsibilities assigned...."	DIRNSA specifies what he wants; others have to provide.
7	no ref.	Requires DCI to provide DIRNSA with "unique handling requirements associated with the protection of sensitive compartmented intelligence."	DIRNSA free to accept, modify or reject requirements. Does not accurately recog- the DCI's statutory responsibilities and authorities.

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